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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Amendment of Section 73.202(b) ) MM Docket No. 97-225  
Table of Allotments ) RM-9173  
FM Broadcast Stations )  
(Olney and Archer City, Texas) )

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

**COMMENTS AND COUNTERPROPOSAL**

Hunt Broadcasting, Inc. ("HBI"), licensee of Station KIKM(FM) (formerly KDVE(FM)), Denison-Sherman, Texas and permittee of Station KJKB, Jacksboro, Texas, by its counsel, hereby submits comments in the above referenced proceeding. HBI's comments are filed for the purpose of offering an alternative Class C2 channel to be allotted at Olney, Texas to avoid a conflict with HBI's previously filed and pending counterproposal in MM Docket No. 97-104. HBI does not oppose the proposal of Texas Grace Communications ("TGC") to reallocate Channel 248C2 from Olney to Archer City, Texas and modify the construction permit for Station KRZB, accordingly. In addition, HBI does not oppose allotting a replacement channel at Olney to provide a first local service. However, only in the event that TGC or the Commission does not agree with the proposed alternate Class C2 channel that HBI's offers herein for Olney, HBI asks that its previously filed and pending counterproposal in MM Docket No. 97-104 be considered as a counterproposal in this proceeding as well. In support hereof, HBI states as follows:

1. On May 19, 1997, HBI submitted a counterproposal in MM Docket No. 97-104, which, inter alia, proposed the substitution of Channel 269C for Channel 269C1 and its reallocation from Denison-Sherman to Azle, Texas. The record in that proceeding is closed. Nevertheless, the Commission has accepted and proposed the conflicting allotment of Channel

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270 C2 at Olney. HBI assumes that this proposal is the result of an oversight and can easily be corrected by considering alternative Channel 282C2 for allotment to Olney, Texas. In the attached engineering statement, HBI provides a channel study which demonstrates that Channel 282C2 can be allotted to Olney with a site restriction and provide a first local service.<sup>1</sup> TGC has stated that it desires to apply for a channel in Olney even though it is at the same time proposing to relocate to Olney station to Archer City. Certainly, TGC is entitled to have a station in Archer City and, assuming there are no duopoly problems under Section 73.3555 of the Commission's Rules, can apply for a station in Olney. HBI has no objection to the allotment of a non-conflicting channel at Olney.

2. Accordingly, the Commission can proceed with the instant MM Docket No. 97-225 using an alternate channel at Olney without any regard to HBI's pending proposal in MM Docket No. 97-104. The two proceedings can remain separate and, in the interest of obtaining action in the most expedited fashion, HBI prefers to have the docketed proceedings remain separate. In view of the fact that the Commission should not have accepted and proposed Channel 270C2 at Olney due to HBI's cut-off conflicting proposal at Azle, Texas, HBI does not believe it necessary for it to file the entire counterproposal in this proceeding to ensure that its pending proposal receives consideration.<sup>2</sup> Nevertheless, in the event that the Commission does

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<sup>1</sup> In TGC's petition for Channel 270C2 at Olney, Channel 269A at Jacksboro is assumed to be deleted in another rule making proceeding (MM Docket No. 95-126). However that docket is not final. Although an alternate channel is available at Jacksboro, if it is not allotted in MM Docket No. 95-126, it may be necessary for TGC to indicate that it would reimburse Station KJKB to change channels. However, as stated, the allotment of Channel 282C2 at Olney will eliminate this problem.

<sup>2</sup> The pleading and supplement is voluminous and contains nearly 100 pages. However a copy is being served on TGC.

not agree to proceed with the two dockets independently, and in the unlikely event that Channel 282C2 is unacceptable as a replacement channel at Olney, HBI offers its pending counterproposal to allot Channel 269C to Azle as a counterproposal in this proceeding. As stated, the counterproposal is already on file and the engineering statement herein contains new updated channel studies.

3. As a counterproposal to Olney, the comparison is between a first local service at Olney (population 3,519 persons) and a first local service at Azle (population 8,868). Under numerous Commission case precedent and Revision of FM Assignment Policies and Procedures, 90 FCC Rcd 88 (1982), the Commission favors a first local service at the larger community. Here Azle, Texas is substantially larger, i.e., more than double the size of Olney, Texas. See e.g., Bostwick and Good Hope, Georgia, 6 FCC Rcd 5796 (1990). In addition, there would be an increase in population and service area for Azle is 1,473,962 persons (90% increase) and 21,790 sq. km (82% increase) over its current Class C3 60 dBu service area.<sup>3</sup> Thus, if the Commission treats the HBI counterproposal in this proceeding, the allotment of Channel 269C at Azle would be preferred over Channel 270C2 at Olney.

4. Of course, Channel 248C2 is already allotted to Olney and thus, the benefit in TGC's proposal is a first local service at Archer City, Texas. Archer City is even smaller (population 1,748 persons) than Olney. If a comparison were to be made between Archer City obtaining a first local service versus HBI's proposal for Azle, again Azle would be entitled to the new channel.

5. As stated earlier, HBI does not believe that its counterproposal of May 19, 1997 must be filed and considered in the instant proceeding. The HBI counterproposal can be

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<sup>3</sup> Station KIKM(FM) has a Class C1 allotment which is subject to an Application for Review. The increase in coverage over the Class C1 is 1,080,577 persons (66% increase) and 10,061 sq. km (38%).

considered separately and is actually entitled to protection against later filed conflicting proposals such as this one filed here by TGC. Nevertheless, an alternate channel (282C2) is available for a first local service at Olney thereby obviating the need to have the HBI counterproposal considered in this proceeding.

Respectfully submitted,

HUNT BROADCASTING, INC.

By:



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Washington, DC 20554  
(202) 637-9086

Its Counsel

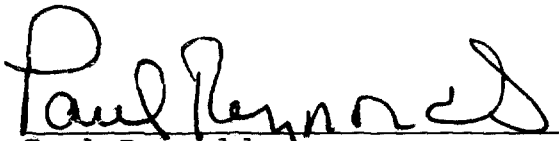
December 22, 1997

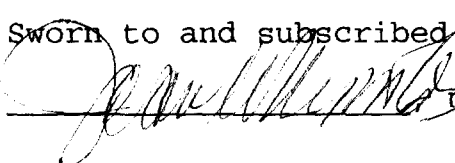
ENGINEERING CERTIFICATION

STATE OF ALABAMA    )  
                              )  
BUTLER COUNTY        )

Paul Reynolds, being first duly sworn upon oath deposes and says:

- \* That he has completed undergraduate studies in the field of communications at the University of Southern Mississippi.
- \* That he has completed course requirements for a Masters Degree in communications at the University of Alabama.
- \* That he completed basic electronics at DeVry Technical Institute.
- \* That he has been operating as an independent communications consultant since 1980.
- \* That he is familiar with the Commission's Rules and Regulations.
- \* That the engineering information for the instant Counterproposal and Comments pertaining to Channel 248C2 at Archer, Texas, and Channel 270C2 at Olney, Texas, was prepared for Hunt Broadcasting, Inc., by him or under his direct supervision.
- \* That all information presented is believed to be true and correct and in full compliance of the technical standards contained in the Commission's Rules and Regulations in affect at the time of the document's filing date.

  
Paul Reynolds

Sworn to and subscribed before, this 22 day of Dec., 1997.  
 my commission expires 7-15-2000.

**ENGINEERING STATEMENT**  
In Support of  
**COMMENTS AND COUNTERPROPOSAL**  
Channel 270C2, Olney, TX  
Channel 248C2, Archer, TX  
MM DOCKET 97-225, RM-9173  
HUNT BROADCASTING, INC.

This engineering statement is offered in support of comments and counterproposal in MM Docket 97-225. The instant document is submitted by Hunt Broadcasting Company, Inc., licensee of KIKM(FM) ("KIKM") Denison-Sherman, Texas.

Previously Hunt filed a counterproposal in MM Docket 97-104. It proposed to change the licensed facilities of KIKM by seeking a change in its community of license (Denison-Sherman to Azle, Texas) and a co-channel upgrade to a full class C. In order to facilitate this scenario, Hunt proposed that channel 268C1 be deleted at Lawton, OK (KLAQ) and Channel 267C1 be substituted there instead. When the Hunt counterproposal was filed Channel 267C3 was being proposed at Wellington, Texas.

The Hunt counterproposal, which was timely filed, was not timely entered into the Commission's data base and channel 270C2 at Olney was allowed to be proposed. Channel 270C2 at Olney conflicts with channel 269C at Azle. Hunt's need to file in the instant proceeding is fully discussed in the legal section of the instant document.

Even though Channel 270C2 at Olney conflicts with channel 269C at Azle (which is now listed in the Commission's data base), the mutually exclusive scenario

between Azle and Olney can be resolved. A channel search for Hunt has determined that an alternate channel is available at Olney which does not conflict with the Hunt Counterproposal in MM Docket 97-104. Channel 282C2 can be allocated as a first local service at Olney once channel 248C2 is deleted and allotted to Archer City, Texas. The Hunt counterproposal in MM Docket 97-104 in no way conflicts with the allocation of channel 248C2 at Archer City, and since channel 282C2 can be allotted for channel 270C2 at Olney, all MX relationships between MM Docket 97-104 and MM Docket 97-225 can be eliminated.

**CH 270C2 @ OLNEY AND CH 269C @ AZLE CONFLICT**

Exhibit E, figure 1 is a channel spacing study using the proposed allocation coordinates of channel 270C2 at Olney as reference. Exhibit E, figure 2 is an allocation study is using a site restriction of 26.22 kilometers south of Olney as reference. This study depicts that channel 282C2 can be allocated to Olney in lieu of channel 270C2 since the site restriction is only 26.22 kilometers and the city grade distance for a class C2 is 32.6 kilometers. The channel 282C2 city grade relationship to Olney is depicted in Exhibit E, figure 3.

**CHANNEL STUDIES IN MM DOCKET 97-104 REVISITED**

If it is determined that the Hunt counterproposal in MM Docket 97-104 has to be considered as a counterproposal in the instant proceeding (DA 97-2273), new and updated channel studies are provided. Those studies are depicted as Exhibit E, figures 4 - 7. These studies provide documentation that even though the Hunt counterproposal in MM Docket 97-104 was not entered into the Commission data base, there are no present conflicts to the original studies once channel 282C2 is allocated in lieu of channel 270C2 at Olney.

Exhibit E, figure 4 is an allocations study for channel 269C at Azle. It uses the same reference coordinates as those used in the original Hunt MM Docket 97-104 counterproposal. It does not depict all of the changes required in order for channel 269C to be allocated to Azle. It is included to demonstrate that no spacing changes, other than channel 270C2 at Olney, creates short space not discussed in the Hunt MM Docket 97-104 counterproposal. The only difference between the two studies is the proposed allocation of channel 270C2 at Olney which can be eliminated by allotting channel 282C2 instead.

Exhibit E, figure 5 uses the reference coordinates for the substitution of channel 267C1 for channel 268C1 at Lawton, Oklahoma (for use by KLAU). A short space to channel 266A at Ratliff City, Oklahoma, appears on the study. However, this is of no concern since it was an alternate channel to eliminate a conflict at Pauls Valley,

Oklahoma, in an unrelated counterproposal. Channel 266A was offered by the Commission's staff. All interests in an additional channel at Pauls Valley and Ratliff City have been withdrawn. Therefore, the appearance of channel 266A at Ratliff City is a moot matter.

Hunt offered several alternate channels for channel 267C3 at Wellington, Texas. Exhibit E, figure 6 is an allocation study for channel 278C3 at Wellington in lieu of the originally requested channel 267C3. The study depicts that this proposed substitution remains available.

Exhibit E, figure 7 is an allocations study for the substitution of channel 299A for channel 269A at Jacksboro, Texas, for use by KJKB. Hunt is also permittee of KJKB and is aware of a pending rule making which proposes to delete channel 299A at Jacksboro and substitute channel 237A. Since channel 299A was proposed as a substitution in a previous rule making, the short spacing to channel 300C1 at Lewisville is of no concern. If channel 300C1 is allocated to Lewisville, the Commission will allocate channel 237A. Channel 237A does not conflict with any proposed allocations in MM Dockets 97-104 and 97-225.

No reference coordinates used in the MM Docket 97-104 Hunt counterproposal have been changed, therefore, all representations made previously concerning gain/loss area, remaining service and population tabulations remain the same. A copy of the MM Docket 97-104 engineering is on file

at the Allocations Banch and will be served on Texas Grace Communications.

### CONCLUSION

If the instant document is considered as only comments in MM Docket 97-225, the use of Channel 282C2 for Olney, Texas, will eliminate any consideration of the Hunt counterproposal for Azle in this proceeding. This document has demonstrated that the conflict between channel 270C2 at Olney and Channel 269C at Azle can be eliminated when Channel 282C2 is used as an allotment at Olney. The allotment of channel 248C2 at Archer City does not conflict with any of the channel changes proposed by Hunt as a counterproposal in MM Docket 97-104.

However, if this document is considered as a counterproposal, all of the representations made in the previous Docket (MM Docket 97-104) by Hunt must be considered in MM Docket 97-225.

**ENGINEERING STATEMENT  
IN SUPPORT OF**

**COMMENTS AND COUNTERPROPOSAL**

Channel 248C2, Archer City, Texas  
Channel 270C2, Olney, Texas  
MM Docket 97-225, RM-9173  
HUNT BROADCASTING, INC.

**ALLOCATION STUDY - CHANNEL 270C2 @ OLNEY, TEXAS**  
**[DEPICTING SHORT SPACING TO CH 269C @ AZLE, TEXAS]**  
**(USING PETITIONERS ALLOCATION SITE AS REFERENCE)**

33 21 39 N.			Class C2				Search Date	
98 48 42 W.			Current rules spacings				12-21-97	
			Channel	270 -101.9	MHz			
Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin	
AD270	270C2	Olney	TX	0.0	0.00	190.0	-190.00 *	
AD269	269C	Azle	TX	88.2	101.87	188.0	-86.13 *	
Of Concern								
Reference Coordinates for								
Allotment of Ch 269C @ Azle, TX								
Inadvertently omitted from								
Commission's Data Base								
KJKB.C	269A	Jacksboro	TX	104.2	59.77	106.0	-46.23 *	
DE269	269A	Jacksboro	TX	104.2	59.77	106.0	-46.23 *	
KIKM.A	269C1	Denison-Sherman	TX	83.2	158.00	158.0	0.00 *	
KTXQ	271C	Fort Worth-Dallas	TX	116.7	192.17	188.0	4.17 *	
KTST	270C	Oklahoma City	OK	27.7	257.38	249.0	8.38 *	
KQXC	273A	Wichita Falls	TX	19.3	68.25	55.0	13.25	
KTST	270C	Oklahoma City	OK	26.5	271.16	249.0	22.16	
KWFR	270C1	San Angelo	TX	216.4	257.42	224.0	33.42	
KVWCFM	272A	Vernon	TX	334.3	97.59	55.0	42.59	

**EXHIBIT E  
Figure 1**

# ENGINEERING STATEMENT IN SUPPORT OF

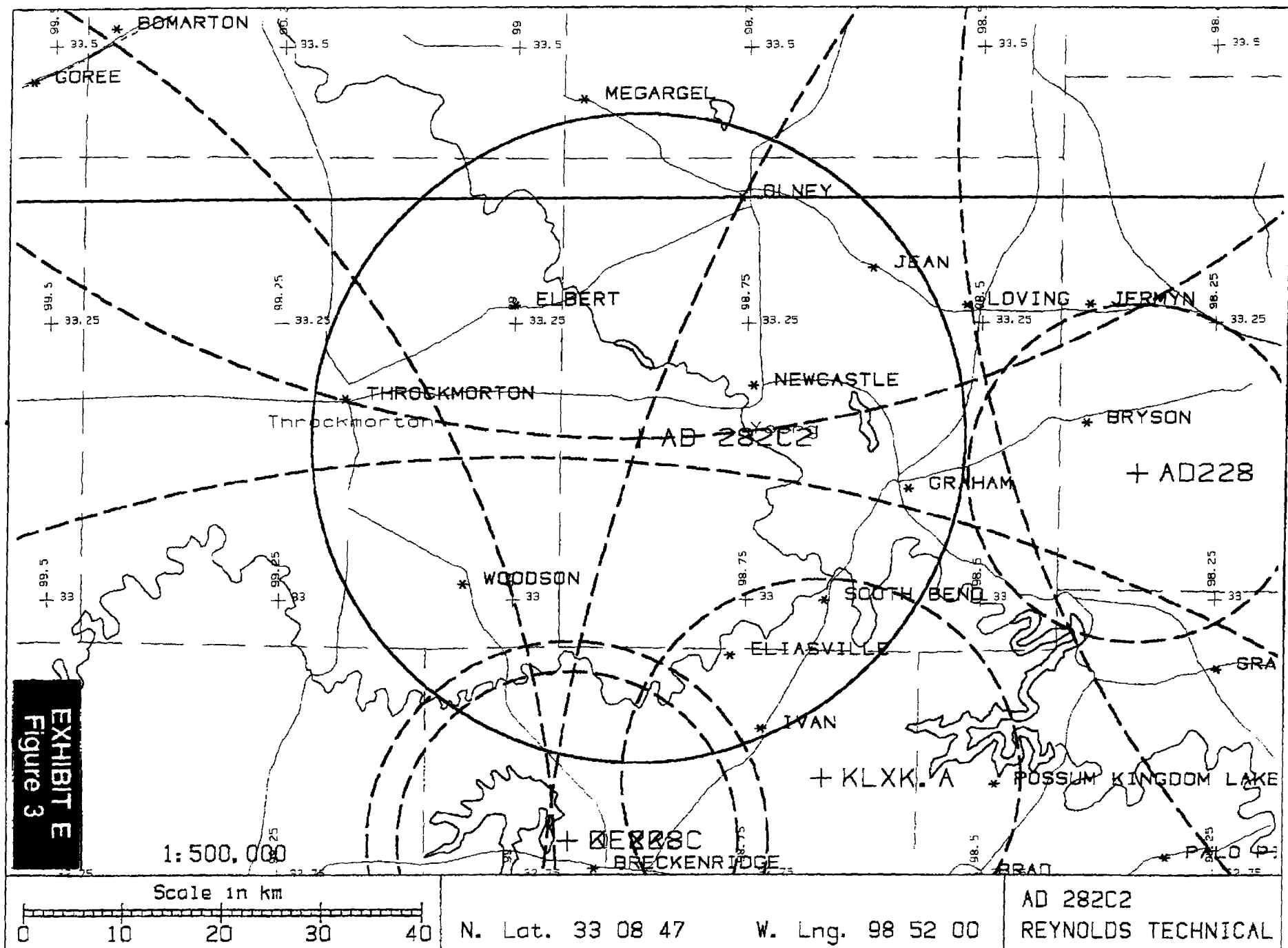
## COMMENTS AND COUNTERPROPOSAL

Channel 248C2, Archer City, Texas  
Channel 270C2, Olney, Texas  
MM Docket 97-225, RM-9173  
HUNT BROADCASTING, INC.

### ALLOCATION STUDY - CH 282C2 @ OLNEY, TEXAS [DEPICTING SPACING TO ALL RELEVANT FM FACILITIES] (USING 26.22 KILOMETER SITE RESTRICTION AS REFERENCE)

33 08 47 N. 98 52 00 W.			Class C2 Current rules spacings Channel 282 -104.3 MHz			Search Date 12-21-97	
Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin
<b>Community of Olney</b>			<b>TX</b>	<b>22.7</b>	<b>26.22</b>		
Reference Coordinates:							
North Latitude: 33-21-52							
West Longitude: 98-45-29							
<b>AD282</b>	<b>282C2</b>	<b>Olney</b>	<b>TX</b>	<b>0.0</b>	<b>0.00</b>	<b>190.0</b>	<b>-190.00 *</b>
Of No Concern							
Site Proposed By Commission Staff							
to Resolve MX Between MM Docket 97-104							
and MM Docket 97-225							
KYYI	284C	Burkburnett	TX	359.4	105.00	105.0	0.00 *
KKDAFM	283C	Dallas	TX	109.2	188.00	188.0	0.00 *
KXYLFM	281C1	Brownwood	TX	184.5	160.40	158.0	2.40 *
KCDD	279C	Hamlin	TX	247.5	122.01	105.0	17.01
KLXK.A	228C2	Breckenridge	TX	151.5	38.83	20.0	18.83
KLXK.C	228C2	Breckenridge	TX	189.6	40.99	20.0	20.99
DE228	228C2	Breckenridge	TX	189.6	40.99	20.0	20.99
KLXK	228C3	Breckenridge	TX	189.6	40.99	17.0	23.99
AD228	228C3	Graford	TX	94.1	49.98	17.0	32.98
KXIL	281C3	Sanger	TX	78.3	151.93	117.0	34.93

**EXHIBIT E**  
**Figure 2**



# ENGINEERING STATEMENT IN SUPPORT OF A

## COUNTERPROPOSAL

Channel 248C2, Archer City, Texas

Channel 270C2, Olney, Texas

MM Docket 97-255, RM-9173

HUNT BROADCASTING, INC.

## ALLOCATIONS STUDY - CHANNEL 269C AT AZLE, TEXAS

[DEPICTING SHORT SPACE TO CH 270C2 @ OLNEY, TEXAS]

(USING HUNT MM DOCKET 97-104 COUNTERPROPOSAL SITE AS REFERENCE)

33 23 20 N. 97 43 03 W.			Class C Current rules spacings Channel 269A -101.7 MHz			Search Date 12-21-97	
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
AD269	269C	Azle	TX	0.0	0.00	290.0	-290.00 *
KIKM.A	269C1	Denison-Sherman	TX	74.2	57.31	270.0	-212.69 *
KJKB.C	269A	Jacksboro	TX	248.0	47.40	226.0	-178.60 *
DE269	269A	Jacksboro	TX	248.0	47.40	226.0	-178.60 *
AD269	269C1	Denison-Sherman	TX	72.3	111.19	270.0	-158.81 *
DE269	269C1	Denison-Sherman	TX	72.3	111.19	270.0	-158.81 *
DE269	269C3	Denison-Sherman	TX	73.8	98.52	237.0	-138.48 *
KIKM	269C3	Denison-Sherman	TX	73.8	98.52	237.0	-138.48 *
<b>AD270</b>	<b>270C2</b>	<b>Olney</b>	<b>TX</b>	<b>268.2</b>	<b>101.87</b>	<b>188.0</b>	<b>-86.13 *</b>
Of Concern							
Proposed allotment of							
Ch 282C2 to eliminate prohibited							
Short Space							
DE268	268C1	Lawton	OK	329.5	149.50	209.0	-59.50 *
KLAW	268C1	Lawton	OK	329.5	149.50	209.0	-59.50 *
KTST	270C	Oklahoma City	OK	4.8	240.52	241.0	-0.48 *
KLTD	269C3	Temple	TX	172.6	236.59	237.0	-0.41 *
WRR	266C	Dallas	TX	127.1	112.31	105.0	7.31 *
WRR	266C	Dallas	TX	141.7	112.91	105.0	7.91 *
KTXQ	271C	Fort Worth-Dallas	TX	142.2	113.24	105.0	8.24 *
KOXE	268C1	Brownwood	TX	213.6	221.00	209.0	12.00
DE272	272A	Madill	OK	47.6	118.17	95.0	23.17
KMADEFM	272A	Madill	OK	47.6	118.17	95.0	23.17
KBUS	270C2	Paris	TX	79.4	217.60	188.0	29.60
DE270	270C2	Paris	TX	79.4	217.60	188.0	29.60
KRHDFM	272A	Duncan	OK	349.5	126.70	95.0	31.70
AD266	266A	Ratliff City	OK	7.1	132.01	95.0	37.01
AD267	267C1	Lawton	OK	329.6	148.21	105.0	43.21
KNUE	268C	Tyler	TX	115.8	287.77	241.0	46.77

EXHIBIT E  
Figure 4

# ENGINEERING STATEMENT IN SUPPORT OF

## COMMENTS AND COUNTERPROPOSAL

Channel 248C2, Archer City, Texas

Channel 270C2, Olney, Texas

MM Docket 97-225, RM-9173

HUNT BROADCASTING, INC.

### ALLOCATION STUDY - DE CH 268C1, AD CH 267C1 LAWTON, OK

[DEPICTING CLEARANCE FOR ALLOCATION - CH 266A @ RATLIFF CITY NOTED]  
(USING HUNT MM DOCKET 97-104 COUNTERPROPOSAL SITE AS REFERENCE)

34 32 31 N.			Class C1			Search Date	
98 31 40 W.			Current rules spacings			12-21-97	
	Channel	267 -101.3 MHz					
Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin
AD267	267C1	Lawton	OK	0.0	0.00	245.0	-245.00 *
KLAW	268C1	Lawton	OK	311.2	1.36	177.0	-175.64 *
DE268	268C1	Lawton	OK	311.2	1.36	177.0	-175.64 *
DE267	267C3	Wellington	TX	281.1	160.05	211.0	-50.95 *
AD267	267C3	Wellington	TX	281.1	160.05	211.0	-50.95 *
<b>AD266</b>	<b>266A</b>	<b>Ratliff City</b>	<b>OK</b>	<b>88.0</b>	<b>90.53</b>	<b>133.0</b>	<b>-42.47 *</b>
Of No Concern							
Alternative Ch Proposed by Staff							
to Eliminate Pauls Valley/Ratliff City							
Conflict. All Expressions of Interest							
Withdrawn							
KWOX	266C	Woodward	OK	336.4	209.01	209.0	0.01 *
KMCO	267C1	Mcalester	OK	80.3	259.66	245.0	14.66
KMCO	267C1	Mcalester	OK	79.2	263.30	245.0	18.30
KTST	270C	Oklahoma City	OK	43.8	134.21	105.0	29.21
KIXCFM	265C3	Quanah	TX	251.0	112.84	76.0	36.84
KIXCFM	265A	Quanah	TX	257.4	114.83	75.0	39.83
KTST	270C	Oklahoma City	OK	40.1	146.06	105.0	41.06
DE264	264C3	Bowie	TX	146.7	119.05	76.0	43.05
KRJTFM	264C3	Bowie	TX	146.7	119.05	76.0	43.05
AD269	269C	Azle	TX	149.6	148.21	105.0	43.21
DE265	265C3	Sulphur	OK	95.3	122.25	76.0	46.25
KFXT.C	265C3	Sulphur	OK	95.3	122.25	76.0	46.25
WRR	266C	Dallas	TX	140.0	255.37	209.0	46.37
KTEO	213C3	Wichita Falls	TX	181.1	71.53	24.0	47.53

**EXHIBIT E**  
**Figure 5**

**ENGINEERING STATEMENT  
IN SUPPORT OF**

**COMMENTS AND COUNTERPROPOSAL**

Channel 248C2, Archer City, Texas  
Channel 270C2, Olney, Texas  
MM Docket 97-225, RM-9173  
HUNT BROADCASTING, INC.

**ALLOCATION STUDY - CHANNEL 278C3 AT WELLINGTON, TEXAS**  
**[DEPICTING CH 278C3 CAN BE ALLOTTED TO WELLINGTON]**  
**(USING ORIGINAL CH 267C3 ALLOCATION SITE AS REFERENCE)**

34 49 13 N. 100 14 29 W.			Class C3 Current rules spacings Channel 278 -103.5 MHz				Search Date 12-22-97	
Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin	
AD278	278C3	Wellington	TX	0.0	0.00	153.0	-153.00 *	
ALOPEN	278C1	Alva	OK	32.4	231.52	211.0	20.52	
KHFD.C	278C2	Hereford	TX	267.3	198.50	177.0	21.50	
AP278	278C1	Alva	OK	33.7	232.64	211.0	21.64	
KRPTFM	279C1	Anadarko	OK	85.5	171.06	144.0	27.06	
KWFSEFM	277C1	Wichita Falls	TX	123.3	186.90	144.0	42.90	
KRMN.C	224A	Shamrock	TX	359.9	57.81	12.0	45.81	

**EXHIBIT E**  
**Figure 6**

**ENGINEERING STATEMENT  
IN SUPPORT OF  
COMMENTS AND COUNTERPROPOSAL  
Channel 247C2, Archer City, Texas  
Channel 270C2, Olney, Texas  
MM Docket 97-255, RM-9173  
HUNT BROADCASTING, INC.**

**ALLOCATION STUDY - CHANNEL 299A AT JACKSBORO, TEXAS  
[DEPICTING CHANNEL SEPARATIONS FOR CH 299A AT JACKSBORO]  
(USING PROPOSED ALLOCATION COORDINATES AS REFERENCE)**

33 14 14 N. 98 09 43 W.			Class A Current rules spacings Channel 299 -107.7 MHz				Search Date 12-22-19	
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin	
AD299	299A	Jacksboro	TX	0.0	0.00	115.0	-115.00	*
ALOPEN	299A	Jacksboro	TX	0.0	0.00	115.0	-115.00	*
DE299	299A	Jacksboro	TX	0.0	0.00	115.0	-115.00	*
AD300	300C1	Lewisville	TX	86.0	87.10	133.0	-45.90	*
Of Note: If Ch 300C1 is Allotted to Lewisville, Ch 237A will be Substituted at Jacksboro Neither channel conflicts with Ch 248C2 at Archer City or Ch 282C2 at Olney								
KOAI	298C1	Fort Worth	TX	122.9	133.02	133.0	0.02	*
KWKQ.A	296C3	Graham	TX	253.1	42.03	42.0	0.03	*
ALOPEN	296C3	Graham	TX	253.1	42.03	42.0	0.03	*
KOAI.C	298C1	Fort Worth	TX	122.8	133.49	133.0	0.49	*
KWKQ	296A	Graham	TX	253.1	42.03	31.0	11.03	
DE300	300C2	Gainesville	TX	53.7	120.44	106.0	14.44	
KECS.C	300C3	Gainesville	TX	61.4	115.78	89.0	26.78	
KRXO	299C	Oklahoma City	OK	13.6	263.86	226.0	37.86	
KEYJFM	300C1	Abilene	TX	232.7	174.46	133.0	41.46	

**EXHIBIT E  
Figure 7**

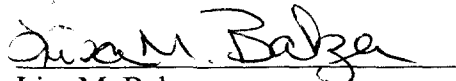
**CERTIFICATE OF SERVICE**

I, Lisa M. Balzer, a secretary in the law firm of Ginsburg, Feldman and Bress, Chartered, do hereby certify that I have, on this 22<sup>nd</sup> of December, 1997, sent by first-class U.S. Mail, postage prepaid, copies of the foregoing "COMMENTS AND COUNTERPROPOSAL" to the following:

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